

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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BENSLEY CONSTRUCTION, INC., on its own behalf and on behalf of all others similarly situated,	)
Plaintiff,	
v.	
)	
MARSH & MCLENNAN COMPANIES, INC.,	)
MARSH, INC., ACE USA, ACE INA, AMERICAN	)
INTERNATIONAL GROUP, AMERICAN	)
REINSURANCE COMPANY, ARTHUR J.	)
GALLAGHER & CO., HILB ROGAL & HOBBS,	)
COMPANY, WILLIS GROUP HOLDINGS, LTD.,	)
WILLIS NORTH AMERICA INC., WILLIS GROUP	)
LTD., UNIVERSAL LIFE RESOURCES,	)
UNIVERSAL LIFE RESOURCES, INC. (d/b/a ULR	)
INSURANCE SERVICES, INC.), THE CHUBB	)
CORPORATION, USI HOLDINGS, INC., METLIFE,	)
INC., PRUDENTIAL FINANCIAL, INC.,	)
UNUMPROVIDENT CORPORATION, THE ST.	)
PAUL TRAVELERS COMPANIES, INC., ZURICH	)
AMERICAN INSURANCE COMPANY, LIBERTY	)
MUTUAL GROUP INC., LIBERTY MUTUAL	)
INSURANCE COMPANY, LIBERTY MUTUAL	)
FIRE INSURANCE COMPANY, EMPLOYERS	)
INSURANCE COMPANY OF WAUSAU, and ST.	)
JAMES INSURANCE COMPANY LTD.,	)
Defendants.	
)	

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Civil Action No. 05 11249 GAO

**MOTION FOR ADMISSION OF MOLLY LEHR  
TO PRACTICE BEFORE THIS COURT PRO HAC VICE**

Pursuant to this Court's Local Rule 83.5.3(b), Paula M. Bagger, a member in good standing of the Bar of this Court and counsel to defendant American Re-Insurance Company herein, hereby moves that attorney Molly Lehr, a member in good standing of

the New York State Bar and the Bar of the United States District Court for the Southern District of New York, be granted leave to appear on behalf of defendant American Re-Insurance Company and practice in this Court *pro hac vice* in the above-captioned action.

As set forth in the accompanying Affidavit of Molly Lehr in support of this motion for admission *pro hac vice*:

- 1) Ms. Lehr is an associate with the firm of Dewey Ballantine LLP, 1301 Avenue of the Americas, New York, NY 10019-6092.
- 2) Ms. Lehr is a member in good standing in every jurisdiction in which she is admitted to practice;
- 3) There are no disciplinary proceedings pending against Ms. Lehr in any jurisdiction; and
- 4) Ms. Lehr is familiar with the local rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Paula M. Bagger respectfully requests that this Motion be allowed and that Molly Lehr be granted leave to appear on behalf of defendant American Re-Insurance Company and practice in this Court *pro hac vice* in the above-captioned action.

AMERICAN REINSURANCE COMPANY

By its attorneys

\_\_\_\_\_/s/ Paula M. Bagger\_\_\_\_\_  
Paula M. Bagger (BBO No. 547703)  
COOKE CLANCY & GRUENTHAL LLP  
265 Franklin Street  
Boston, MA 02110  
(617) 428-6800

Dated: July 1, 2005

**CERTIFICATE OF SERVICE**

I, Paula M. Bagger, hereby certify that I have served a true copy of the foregoing on those counsel on the attached service list who do not otherwise receive electronic notice, by first-class mail, postage prepaid, this 1<sup>st</sup> day of July, 2005

\_\_\_\_\_/s/ Paula M. Bagger\_\_\_\_\_

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Defendants. )

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Civil Action No. 05 11249 GAO

**AFFIDAVIT OF MOLLY LEHR IN SUPPORT  
OF MOTION FOR ADMISSION *PRO HAC VICE***

I, Molly Lehr, being duly sworn, depose and say:

1. I am an associate in the New York, New York law firm of Dewey  
Ballantine LLP. Our offices are located at 1301 Avenue of the Americas, New York,  
New York, 10019-6092.

2. I am a member of the Bar of the State of New York and of the United States District Court for the Southern District of New York. I am a member in good standing of the bar in each jurisdiction to which I have been admitted to practice.

3. There are no disciplinary proceedings pending against me in any jurisdiction.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 30th day of June, 2005.

/s/ Molly Lehr  
Molly Lehr